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Counsel for United Parcel Service, Inc., and UPS Capital Corporation

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GENERAL MOTORS CORP., *et al.*,

Debtors.

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Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that UNITED PARCEL SERVICE, INC., and UPS CAPITAL CORPORATION (collectively, "UPS"), creditors and parties-in-interest in the above-captioned cases, hereby appear pursuant to 11 U.S.C. §1109(b) and request, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007, and 9010, that copies of all notices and pleadings given or filed in the above-captioned cases be given or served upon the persons listed below at the following addresses:

Faye B. Feinstein, Esq.
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PLEASE TAKE FURTHER NOTICE that this request includes all papers, reports, orders, notices, copies of applications, motions, petitions, disclosure statements, plans of readjustment of debts, of liquidation, or of reorganization, pleadings, appendices, exhibits, requests, or demands whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, delivery service, telephone, facsimile, telegraph, telex, or otherwise. This request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, objection, response, request, complaint, demand, statements of affairs, operating reports, or schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that affects or seeks to affect in any way any rights or interests of UPS in this case.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a consent or waiver by UPS: (1) to the personal jurisdiction of the Court; (2) to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (3) of the right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (4) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (5) of any other rights, claims, actions, setoffs, or recoupments to which UPS is or

may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments UPS expressly reserves.

Dated: June 30, 2009

QUARLES & BRADY LLP

By: /s/ Christopher Combest
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